

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE**

MARY L. WARREN,

Plaintiff,

v.

**FLYWAY EXPRESS, LLC,
DHL EXPRESS (USA), INC. and
JOHN DOES 1-3,**

Defendants.

)
) **NO.**_____
)
) **JUDGE**_____
)
) **MAGISTRATE JUDGE**
) _____
) **JURY DEMAND**
)

NOTICE OF FILING OF REMOVAL TO PLAINTIFF’S ATTORNEY

Notice is hereby given that defendants Flyway Express, LLC and DHL Express (USA), Inc. (“Defendants” or “Flyway” and “DHL”) in the above-styled cause heretofore filed in the Circuit Court of Shelby County, Tennessee, has this day filed in the District Court of the United States for the Western District of Tennessee, in the office of the Clerk thereof, in Memphis, Tennessee, a Notice of Removal of this cause from the state court to the District Court and have attached to the Notice of Removal the Complaint and other initial file documents. A copy of the Notice of Removal is attached hereto and served herewith.

This the 10th day of June 2025.

Respectfully submitted:

/s/ Peter Robison

Peter C. Robison, BPR #27498
424 Church Street, Suite 2500
Nashville, TN 37219
Phone: 615-259-1366
probison@lewisthomason.com

Caroline Montoya, BPR #41330
40 S. Main Street, Suite 2900
Memphis, Tennessee 38103
(901) 525-8721
cmontoya@lewisthomason.com

*Counsel for Flyway Express, LLC and DHL
Express (USA), Inc.*

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing NOTICE OF FILING OF REMOVAL TO PLAINTIFF'S ATTORNEY has been served on the following counsel of record via email:

Henry Reaves, III
2650 Thousand Oaks Blvd, Ste 3100
Memphis TN 38118
Henry.reaves@beyourvoice.com

Counsel for the Plaintiff

This the 10th day of June 2025.

/s/ Peter Robison

IN THE CIRCUIT COURT FOR SHELBY COUNTY, TENNESSEE

MARY L. WARREN,)	
)	
Plaintiff,)	
v.)	Case No.: CT-1866-25
)	
FLYWAY EXPRESS, LLC,)	JURY DEMAND
DHL EXPRESS (USA), INC. and)	
JOHN DOES 1-3,)	
)	
Defendants.)	

NOTICE OF FILING OF NOTICE OF REMOVAL TO FEDERAL COURT

TO: Jamita Swearengen, Clerk
Shelby County Circuit Court
140 Adams Avenue, Room 324
Memphis, TN 38103

Please take notice that defendants Flyway Express, LLC and DHL Express (USA), Inc. (“Defendants” or “Flyway” and “DHL”) by and through counsel, pursuant to 28 U.S.C. § 1441, *et seq.*, has filed in the United States District Court for the Western District of Tennessee, a Notice of Removal of the above-captioned cause of action from the Shelby County Circuit Court to the United States District Court for the Western District of Tennessee. A copy of the Notice of Removal is attached as Exhibit 1. The basis for removal of this cause of action is an amount in controversy exceeding \$75,000, which places original jurisdiction over this matter with the District Court. Pursuant to 28 U.S.C. § 1446(d), the Shelby County Circuit Court shall proceed no further on this case unless and until the case is remanded by the United States District Court for the Western District of Tennessee.

Please promptly acknowledge receipt and filing of this Notice and the copy of the Notice of Removal in your office by completing and signing the Acknowledgment found at the bottom of

this Notice, an extra copy of which is enclosed for this purpose, with the request that it be returned when signed.

Respectfully submitted:

/s/ Peter Robison

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*Counsel for Flyway Express, LLC and DHL
Express (USA), Inc.*

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing NOTICE OF FILING OF NOTICE OF REMOVAL TO FEDERAL COURT has been served on the following counsel of record via email:

Henry Reaves, III
2650 Thousand Oaks Blvd, Ste 3100
Memphis TN 38118
Henry.reaves@beyourvoice.com

Counsel for the Plaintiff

This the 10th day of June 2025.

/s/ Peter Robison

ACKNOWLEDGEMENT

I, Jamita Swearengen, Circuit Court Clerk of Shelby County, Tennessee, do hereby acknowledge receipt of the above notice and papers referred to therein, and certify that I have on the date and hour below stated, filed the said copy of the Notice to remove this cause to the United States District Court for the Western District of Tennessee, this _____ day of _____, 2025.

Jamita Swearengen